

SEALED

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

AUG - 2 2016

United States District Court

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

CLERK, U.S. DISTRICT COURT
By _____ Deputy

V.

COMPLAINT

LANCE ALVIN COUBRY (JR) (1)
LANCELOT ALVIN COUBRY
AKA LANCE ALVIN COUNBRY (SR) (2)

CASE NUMBER: 3-16-MJ- 644 BK

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 2, 2016, in the Dallas Division of the Northern District of Texas, defendants Lance Alvin Coubry (Jr) and Lancelot Alvin Coubry, aka Lance Alvin Coubry (Sr), did,

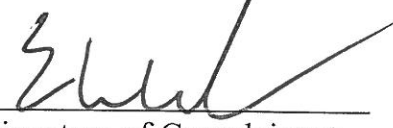
knowingly possess in and affecting interstate commerce a firearm having been convicted of a crime punishable by imprisonment for a term exceeding one year,

in violation of Title 18, United States Code, Section(s) 922(g)(1).

I further state that I am a Special Agent with Texas Department of Public Safety (DPS) and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Eric Wilson which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


Signature of Complainant
Eric Wilson
Special Agent, DPS

Sworn to before me and subscribed in my presence, on this 2nd day of August, 2016, in Dallas, Texas.

RENEE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Eric Wilson, a Special Agent (SA) with the Texas Department of Public Safety (DPS), being duly sworn, deposes and states:

1. I have been employed as a certified peace officer commissioned by the Texas Department of Public Safety (DPS) for approximately twelve years. I have been assigned to the Criminal Investigations Division (CID) since February 1, 2009. Prior to being assigned to CID, I was a Highway Patrol Trooper for approximately four and a half years. I hold a master peace officer's license from the Texas Commission on Law Enforcement (TCOLE). I have experience investigating violations of the Texas Health and Safety Code, including but not limited to, the procurement and execution of search warrants, interviewing and working with confidential informants, the detection and identification of various narcotics and other dangerous drugs and the review of taped conversations obtained from wire intercepts. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are transported, stored, distributed, and the methods of payments for such drugs. I am also familiar with the methods by which narcotics traffickers communicate and the code words commonly used by narcotics traffickers. I have participated in both open and covert surveillance including conventional as well as electronic surveillance. I have received extensive training with electronic surveillance and have attended the National Technical Investigators' Association conference. I have significant experience locating and arresting federal, state and local fugitives. I am a task force officer for the U.S. Marshals Service Joint East Texas fugitive task force. I am also a task force officer for Homeland Security

Investigations – National Gang Unit. I have assisted and lead investigations involving violations of the Controlled Substances Act Title 21 U.S.C. These investigations have led to successful federal indictments and convictions.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7); that is, I am an officer of the United States who is authorized by law to conduct investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. Because this affidavit is offered for the limited purposes of supporting a criminal complaint charging **LANCE ALVIN COUBRY, (JR)** and **LANCELOT ALVIN COUBRY aka LANCE ALVIN COUBRY (SR)** with a violation of 18 U.S.C. § 922(g)(1), it does not include all facts known to me regarding this investigation.

PROBABLE CAUSE

4. On 07-20-16, I was contacted by a Deputy U.S. Marshal (DUSM) regarding a suspect previously arrested by the U.S. Marshals Service (USMS). The DUSM identified the suspect as Lance Alvin Coubry DOB 06-11-84. According to the DUSM, U.S. Marshals arrested Coubry on an arrest warrant for Aggravated Robbery issued by the Grayson County Sheriff's Office. I reviewed Coubry's criminal history return and observed that Coubry was arrested on 02-11-16 for the Aggravated Robbery charge. The DUSM informed me that Coubry broke into a home, brandished a firearm, and robbed a female suspect who also had an infant present in the home.

5. On 07-21-16, I spoke with a Collin County District Attorney (CCDA) Investigator regarding Coubry's prior arrests and convictions in California. The CCDA

Investigator spoke with a Los Angeles County District Attorney Investigator who confirmed that Coubry is a convicted felon. The Los Angeles District Attorney Investigator stated that Coubry served time in jail for a prohibited weapon offense that was classified as a felony offense and Coubry was finally convicted of this felony offense. The CCDA Investigator forwarded me the conviction record for this offense for my review. I noticed the judgement also stated that Coubry stipulated to another prior felony conviction for Robbery under California Penal Code section 211 and was finally convicted on 01-08-02.

6. I reviewed Coubry's public Facebook page and observed Coubry in possession of numerous firearms and illegal narcotics. Coubry also made numerous references to committing robberies and made statements regarding murdering police officers.

7. Based on evidence reviewed from Facebook and visual surveillance at Coubry's residence, I obtained a federal search warrant on 08-01-16. The search warrant was executed on 08-02-16. Coubry and Coubry's father were both present in the residence at the time of the search warrant execution. A Stoeger Cougar .40 S&W pistol (SN: T6429-14000265), Taurus PT140 Pro .40 S&W pistol (SN: SCP55494), Bryco Arms Model 38 .32 auto pistol (SN:009026) and a Llama Mod 1 .32 auto pistol (SN: 139540) were all seized from Coubry's bedroom. The Stoeger Cougar was located in a drawer immediately next to Coubry's Texas identification card.

8. A search of the bedroom utilized by Coubry's father, Lancelot Alvin Coubry aka Lance Alvin Coubry (SR), resulted in the seizure of a Ruger LCP .380 ACP pistol (SN:

376-38924) and a Marlin .22lr rifle (SN: 26309968). The Ruger LCP pistol was lying on the bed that was utilized by Coubry (SR), and Coubry (SR) was confronted in this same bedroom at the time of the search warrant execution. Several articles of mail and other identifying information were also observed that confirmed Coubry (SR) occupied this bedroom.

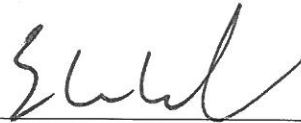
9. I spoke with an ATF agent, who has training in firearms, and provided him with the make and model of these firearms. He informed me that each and all of these firearms had traveled in interstate commerce

10. Coubry and Coubry (SR) were transported to Dallas Police Department (DPD) Headquarters and interviewed. Coubry (SR) was advised of the *Miranda* warnings, understood and agreed to speak with Agents. Coubry (SR) admitted to being a convicted felon and admitted to possessing the Ruger LCP pistol and the Marlin .22 rifle.

11. Coubry was advised of the *Miranda* warnings, understood and agreed to speak with Agents. Coubry admitted to possessing and owning the firearms seized from Coubry's bedroom and possession of the marijuana seized from Coubry's residence.

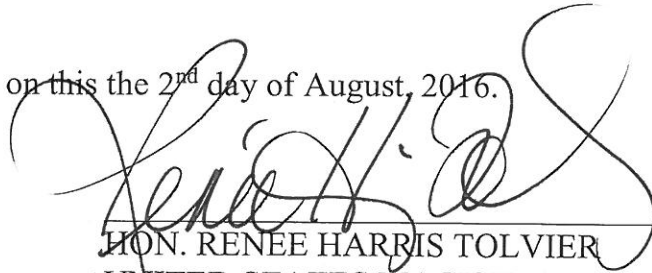
CONCLUSION

11. Based on the foregoing facts, probable cause exists to believe that **LANCE ALVIN COUBRY** and **LANCELOT ALVIN COUBRY aka LANCE ALVIN COUBRY (SR)** having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, in violation of 18 U.S.C. § 922(g)(1).



Eric Wilson, Special Agent
Texas Department of Public Safety
Task Force Officer

Subscribed and sworn to before me on this the 2nd day of August, 2016.



HON. RENEE HARRIS TOLVIER
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS